

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation;  
and VERA BRADLEY DESIGNS, INC. an  
Indiana corporation,

Plaintiffs,

v.

WEI "TONY" JIANG, an individual;  
DAIXIUZHEN DIAUXZHEN, an individual;  
DAI XIUZHEN CO., an unknown entity; ZHU  
YOUNG CHENG a/k/a "ZHU YONGCHENG,"  
an individual; "ZHU YOUNGCHENG CO.," an  
unknown entity; ZHENYAO YANG, an  
individual; "ZHENYAO YANG CO.," an  
unknown entity; YOKO NAKAMURA, an  
individual; JUN FAN, an individual; AKIRA  
NAKAMURA, an individual; LILI NELSON, an  
individual; WENJUN SONG, an individual;  
WENJUAN LIU, an individual; and JOHN  
DOES 1-10,

Defendant.

No. 2:18-cv-00356-RSL

STIPULATED PERMANENT  
INJUNCTION

**STIPULATION**

Plaintiffs Amazon.com, Inc. ("Amazon") and Vera Bradley Designs, Inc. ("Vera Bradley"), and Defendant Wei Jiang ("Defendant"), by and through their respective counsel of record if applicable, hereby stipulate and agree as follows:

1. The Court may enter the following permanent injunction.
2. Defendant hereby fully and irrevocably consents to the jurisdiction of the state and federal courts in King County, Washington, in any action or proceeding in which Amazon

STIPULATED PERMANENT INJUNCTION  
(No. 2:18-cv-00356-RSL) - 1

Davis Wright Tremaine LLP  
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Seattle, WA 98104-1610  
206.622.3150 main 206.757.7700 fax

1 or Vera Bradley seeks to enforce this injunction or otherwise stemming from Defendant'  
2 noncompliance with this injunction.

3 DATED: April 29, 2019

4 DAVIS WRIGHT TREMAINE LLP  
5 *Attorneys for Plaintiffs Amazon.com, Inc. and*  
6 *Vera Bradley Designs, Inc.*

7 By /s/ James Harlan Corning  
8 Bonnie E. MacNaughton, WSBA #36110  
9 James Harlan Corning, WSBA #45177  
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14 Email: bonniemacnaughton@dwt.com  
15 jamescorning@dwt.com

16 WEI JIANG  
17 *Defendant*  
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STIPULATED PERMANENT INJUNCTION  
(No. 2:18-cv-00356-RSL) - 2

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18 WEI JIANG  
19 *Defendant*

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**PERMANENT INJUNCTION**

Pursuant to the terms of the settlement agreement reached in this matter, including the parties' agreement to stipulate to a permanent injunction, IT IS HEREBY ORDERED that Defendant, his agents, representatives, employees, successors, and assigns are permanently enjoined and restrained from:

1. selling, offering for sale, advertising, marketing, shipping, transmitting, or distributing to Amazon, or to any other person or entity through any of Amazon's websites, any product or service;
2. applying for, opening, operating, controlling or using any Amazon seller or vendor account, or applying for or participating in any Amazon Affiliate Program;
3. manufacturing, distributing, offering to sell, or selling any product or service that incorporates Vera Bradley's brand, trademarks, or copyrights, or otherwise using Vera Bradley's brand, trademarks, or copyrights to manufacture, distribute, offer, or sell any product or service; and
4. assisting, aiding, or abetting any other person or entity in engaging in or performing any of the activities listed above.

**IT IS SO ORDERED.**

DATED: May 2, 2019

  
The Honorable Robert S. Lasnik  
United States District Judge